

**Comments in Response to Localism Notice of Proposed Rulemaking
MB Docket No. 04-233**

I submit the following comments in response to the Localism Notice of Proposed Rulemaking (the "NPRM"), released Jan. 24, 2008, in MB Docket No. 04-233. Much of this letter was drafted by someone more familiar with the rule changes, but I agree with the comments below. The bottom line is that Christian radio (and internet) provides a very important service to me personally and to many others. It is a valuable resource for encouragement, teaching, and worship. I move every few years with the US Military, and I am very glad to be able to tune into Christian radio as I travel throughout the country, and the world. It is not good to allow non-Christian agencies to dictate the programming of Christian stations. It would hurt the quality and content of the programming and distract from the message of God's forgiveness through the death and resurrection of Christ- a message which these stations exist to uphold. There is a time for hearing opposing views, but I can tune into a number of other stations to hear those if I want to (including, unfortunately, the liberal "National Public Radio"). Also, because many Christian radio networks use donations as their income, they must be very careful to continually evaluate their expenses and have flexibility in the way they operate. This is critical to allow them to serve people in communities large and small. Please do not impose the rules below, which appear to inflict excessive strain on limited-income agencies that are providing valuable services.

Any new FCC rules, policies or procedures must not violate First Amendment rights. A number of proposals discussed in the NPRM, if enacted, would do so – and must not be adopted.

(1) The FCC must not force radio stations, especially religious broadcasters, to take advice from people who do not share their values. The NPRM's proposed advisory board proposals would impose such unconstitutional mandates. Religious broadcasters who resist advice from those who don't share their values could face increased harassment, complaints and even loss of license for choosing to follow their own consciences, rather than allowing incompatible viewpoints to shape their programming. The First Amendment prohibits government, including the FCC, from dictating what viewpoints a broadcaster, particularly a religious broadcaster, must present.

(2) The FCC must not turn every radio station into a public forum where anyone and everyone has rights to air time. Proposed public access requirements would do so – even if a religious broadcaster conscientiously objects to the message. The First Amendment forbids imposition of message delivery mandates on any religion.

(3) The FCC must not force revelation of specific editorial decision-making information. The choice of programming, especially religious programming, is not properly dictated by any government agency – and proposals to force reporting on such things as who produced what programs would intrude on constitutionally-protected editorial choices.

(4) The FCC must not establish a two-tiered renewal system in which certain licensees would be automatically barred from routine renewal application processing. The proposed mandatory special renewal review of certain classes of applicants by the Commissioners themselves would amount to coercion of religious broadcasters. Those who stay true to their consciences and present only the messages they correspond to their beliefs could face long, expensive and potentially ruinous renewal proceedings.

(5) Many Christian broadcasters operate on tight budgets, as do many smaller market secular stations. Keeping the electricity flowing is often a challenge. Yet, the Commission proposes to further squeeze niche and smaller market broadcasters, by substantially raising costs in two ways: (a) by requiring staff presence whenever a station is on the air and, (b) by further restricting main studio location choices. Raising costs with these proposals would force service cutbacks – and curtailed service is contrary to the public interest.

We urge the FCC not to adopt rules, procedures or policies discussed above.

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